

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES GAGNON,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A.,  
SETERUS, INC., PIERCE & ASSOCIATES,  
P.C., EQUIFAX INFORMATION  
SERVICES, and EXPERIAN  
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No. 1:15-cv-09526

Honorable Robert M. Dow, Jr.

**DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.’S  
MOTION TO DISMISS THE AMENDED COMPLAINT**

NOW COMES Defendant Experian Information Solutions, Inc. (“Experian”), by and through its undersigned attorneys, and pursuant to Federal Rule of Civil Procedure 12(b)(6), and hereby moves to dismiss Plaintiff’s Amended Complaint against Experian with prejudice for failure to state a claim on which relief can be granted. In support of its Motion, Experian submits its Memorandum of Law, filed contemporaneously herewith, and incorporates the same as if fully set forth herein.

WHEREFORE, Defendant Experian Information Solutions, Inc. respectfully requests that the Court grant the present Motion to Dismiss and issue an order dismissing Plaintiff’s Amended Complaint with prejudice.

Dated this 27<sup>th</sup> day of April, 2016.

By: /s/ Christopher A. Hall

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*Counsel for Defendant Experian  
Information Solutions, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that, on April 27, 2016, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ Christopher A. Hall